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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS OPPOSITION
TO DEFENDANTS' MOTION IN LIMINE
TO EXCLUDE TESTIMONY OF GARY
BROWN AND KRISTINN GUDJONSSON**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Opposition to Defendants’ Motion in Limine to Exclude Testimony of Gary Brown and Kristinn Gudjonsson (“Waymo’s Opposition”). Waymo’s Administrative Motion seeks an order sealing the following materials:

| Document | Portions to Be Filed Under Seal | Designating Party |
|---|---------------------------------|-------------------|
| Waymo’s Opposition to Defendants’ Motion in Limine to Exclude Testimony of Kristinn Gudjonsson (“Waymo’s Opposition”) | Highlighted in green | Waymo |
| Exhibit 1 to Waymo’s Opposition | Highlighted in green | Waymo |
| Exhibit 5 to Waymo’s Opposition | Highlighted in green | Waymo |

3. Waymo’s Opposition contains or refers to confidential business information, which Waymo seeks to seal. Specifically, Waymo’s Opposition and Exhibits 1 and 5 (portions highlighted in green) contain confidential information regarding Waymo’s security measures and protocols (including staffing of Google’s security team), the scope of forensic investigations conducted (including the identity of non-public targets of those investigations), and detailed computer forensics regarding access to Waymo’s trade secrets. The public disclosure of this information would cause significant competitive harm to Waymo, as its security measures and computer forensics methods would become known to competitors who could use such information to Waymo’s disadvantage. If such information were made public, I understand that Waymo’s competitive standing would be significantly harmed. Waymo’s request to seal is narrowly tailored to only the confidential information.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on September 22,
3 2017.

4 By /s/ Lindsay Cooper
5 Lindsay Cooper
6 Attorneys for WAYMO LLC

7
8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
10 filing of this document has been obtained from Lindsay Cooper.

11 /s/ Charles K. Verhoeven
12 Charles K. Verhoeven